From: Mark Nowak [mailto:nowak_mark@yahoo.com]
Sent: Friday, April 06, 2012 4:35 PM
To: Baskin, Kathleen (EEA)
Subject: Comments on Massachusetts Sustainable Water Management Initiative

Kathleen Baskin, P.E. (Kathleen.Baskin@state.ma.us)
Director of Water Policy and Planning
Executive Office of Environmental Affairs (EEA)
100 Cambridge Street
Boston, MA

Dear Ms. Baskin,

It's great to be able to get outside, walk along any of our rivers and streams, canoe, or kayak, and observe all manner of wildlife that rely, like us, on that water for their existence. These flowing waters are really one of the great resources we are lucky to have in this State. The scientific findings and development of ecologically-based streamflow criteria that have come out of the work on the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012 so far represent a major step forward in keeping healthy rivers for all to enjoy. I appreciate the tremendous effort that state staff and others have dedicated to the SWMI process.

However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed. The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands are clean and flowing. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals.

The proposed safe yield methodology is unacceptable because it is not safe for our rivers. Inaccurate, excessive safe yield values undermine the entire SWMI Framework. The EEA methodology ignores the fact that less water than EEA "safe yield" is available in the summertime, which is also the period of highest water demand. Using EEA's own data and assumptions, if the safe yield were actually withdrawn continuously from our rivers, all Massachusetts rivers would be pumped dry during droughts, and most would be dry for half or more of the summertime. All Massachusetts rivers would be classified as Category 5: Severely Degraded

We can and must do better. This is a once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. Let's start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for seeking comments on the work that has already been done. I hope the end result will truly be healthy flowing rivers in Massachusetts now and well into the future.

Sincerely,

Mark Nowak
1317 N. Astor Street
Milwaukee, WI